

**REVISED SCOPE OF WORK
INTERIM REMOVAL ACTION**

**GULFCO MARINE MAINTENANCE SUPERFUND SITE
FREEPORT, BRAZORIA COUNTY, TEXAS**

I. INTRODUCTION

1. This Scope of Work (SOW) describes activities that will be carried out by Respondents as they implement an Interim Removal Action (IRA) for the Gulfco Marine Maintenance Superfund Site (Site). This SOW is attached to the Administrative Order on Consent (AOC) for the Site and is a supporting document for the AOC. Technical work described in the SOW is intended to provide more information to Respondents for purposes of implementing the AOC and is not intended to change the meaning of any AOC language. This SOW is also consistent with both the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and the National Contingency Plan (NCP). Any discrepancies between the AOC and SOW are unintended, and whenever necessary, the AOC will control in any interpretive disputes.
2. The purpose of the IRA is to remove residual containerized materials (drums and tankage), including containers, associated with former Site operations; reduce the potential for accumulation of rainwater within bermed containment structures at the Site; and upgrade Site security features to reduce the potential for unauthorized land access to that part of the Site south of Marlin Avenue.

Purpose of the Scope of Work

3. This SOW sets forth certain requirements of the AOC for implementation of the Work pertaining to an IRA to be undertaken by Respondents at the Site.

Description of the Site

4. The Gulfco Site is located at 906 Marlin Avenue, Freeport, Brazoria County, TX. The property consists of Lots 21 through 25 and Lots 55 through 58, Subdivision 8, of the Brazos Coast Investment Company. Marlin Avenue separates Lots 55 through 58 on the north from Lots 21 through 25 on the south. Lots 21 through 25 are approximately four-acre tracts bordered on the south by the Intracoastal Waterway. Lots 55 through 58 are approximately five-acre tracts. The entire property is about 40 acres in size.
5. In June 1999, LT Environmental, Inc. prepared a "Site Characterization Report" for LDL Coastal, Inc. regarding Lots 21 through 25, 55, 57, and 58. This report identified 23 aboveground storage tanks (ASTs) within or adjacent to two adjoining concrete berm areas on Lot 23. Other containers (e.g., 55-gallon drums) were also identified in this vicinity. Several of the tanks and drums have been removed from the Site.
6. The Site was proposed for listing on the National Priorities List ("NPL") on September 5, 2002 (67 FR 56794), and was placed on the NPL effective May 30, 2003, in a final rulemaking published on April 30, 2003 (68 FR 23077).

II. TASKS TO BE PERFORMED

Task 1 – Interim Removal Action Work Plan and Site Health and Safety Plan

7. The Respondents shall prepare an IRA Work Plan and an IRA Site Health and Safety Plan (HSP) within thirty (30) calendar days after the Effective Date of this AOC. The Work Plan shall describe field operations to be performed by the removal action contractor and shall be submitted to EPA for review and approval, with a copy to Texas Commission on Environmental Quality (TCEQ). The HSP must be in compliance with Occupational Safety and Health Administration and EPA requirements. Both plans must be in place prior to any onsite activities.

Task 2 - Residual Containerized Waste Characterization and Disposal

8. The purpose of this task is to sufficiently characterize residual containerized materials (liquids and/or sludges) in the AST area and vicinity to facilitate waste classification followed by off-site management. The following activities shall be performed by Respondents as part of Task 2:
 - a. Survey existing containers (e.g., ASTs and drums) at the Site and develop a preliminary list of potential waste streams, physical characteristics (liquid, sludge, etc.) and estimated quantities;
 - b. Sample and analyze each potential waste stream, as needed, to facilitate classification of the waste stream in accordance with all applicable state and federal regulations, and in accordance with any facility-specific requirements of potential management (recycling/disposal) facilities;
 - c. Transport residual containerized materials/wastes to appropriate off-site management facilities in accordance with all applicable state and federal regulations; and
 - d. Secure all records documenting the waste stream characteristics, classifications, quantities and final management locations.

Task 3 – Container Removal

9. The purpose of this task is to remove remaining containers associated with former Site operations (e.g., ASTs and drums) from Lots 21 through 25 at the Site. The following activities shall be performed by Respondents as part of Task 3:
 - a. Evaluate the potential for re-use of remaining containers. Based on this evaluation, identify containers for decontamination and containers for demolition and disposal;
 - b. Decontaminate containers intended for re-use. Develop decontamination procedures on a container-specific basis considering former content characteristics and process knowledge. Manage all decontamination fluids in accordance with applicable state and federal regulations. Document decontamination procedures used;

- c. Remove re-usable containers from the Site following proper decontamination. Document container recipient;
- d. Demolish all containers not suitable for re-use. Demolition may be performed on or off-site. Secure a certificate of destruction for each item demolished; and
- e. Pressure-wash the concrete floor and berms of the former AST tank farm and manage all washwater in accordance with all applicable state and federal regulations. Confirmation wipe samples shall be collected from 6 locations on the containment area floor and 12 locations on the containment area berm walls, as shown on Figure 1. Wall samples shall be collected no higher than 6 inches from the base of the wall. Wipe samples shall be analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds, pesticides, PCBs, and metals. Wipe sample analytical results shall be compared to existing surface area screening criteria for PCBs and lead, as applicable to industrial land use scenarios. Screening criteria for other analytes detected in one or more wipe samples shall be developed assuming industrial land use and based on the methodologies used in “World Trade Center Indoor Air Assessment: Selecting Contaminants of Potential Concern and Setting Health-Based Benchmarks” (May, 2003), or other more appropriate guidance. Pressure washing, confirmation sampling/analysis, screening criteria development and washwater management procedures shall be documented in the IRA report.

Task 4 – Accumulated Rainwater Management

- 10. The purpose of this task is to remove and appropriately manage accumulated rainwater within the former AST area berms on Lot 23. The following activities shall be performed by Respondents as part of Task 4:
 - a. Sample and analyze the accumulated rainwater, as needed, to evaluate management options and facilitate waste classification (if needed);
 - b. Appropriately manage (discharge or dispose) the accumulated rainwater based on the sample analyses and management option evaluation, in accordance with all applicable state and federal regulations; and
 - c. Secure all records documenting the rainwater characterization and subsequent management.

Task 5 – Former AST Tank Farm Berm Demolition

- 11. The purpose of this task is to demolish the former AST area berms to the level necessary to preclude potential future rainwater accumulation within this area. The following activities shall be performed by Respondents as part of Task 5:
 - a. Demolish concrete berms in the former AST area at one or more locations as needed to preclude potential future rainwater accumulation within this area; and
 - b. Document all berm demolition activities.

Task 6 – Site Security Upgrade

12. The purpose of this task is to upgrade existing security features at the Site so as to reduce the potential for unauthorized land access to Lots 21 through 25. The following activities shall be performed by Respondents as part of Task 6:
- a. Repair/replace damaged or missing fence sections on the north, east and west perimeter of the collective area of Lots 21 through 25. Install fencing along any unfenced areas of this perimeter. Repair/replace gates as necessary. Install locks on all gated sections. Place signs at appropriate locations on the boundary fence and at locations along the Intracoastal Waterway; and
 - b. Document all site security upgrades.

Task 7 - Community Relations

13. The purpose of this task is to provide the local community with an explanation of the issues at and the activities being undertaken for the IRA at the Site. Specifically, enable key stakeholders to be:
- a. Aware the EPA, TCEQ and Respondents are working cooperatively to clean up surface issues at the Site;
 - b. Cognizant of the interim removal actions planned for the Site;
 - c. Provided timely, accurate and well-researched information; and
 - d. Given timely responses to inquiries about the IRA at the Site.
14. The activities in Task 7 include:
- a. Identify a Respondents' Community Relations spokesperson to receive and respond to public information requests.
 - b. Develop a list of key stakeholders and a mailing list for same to facilitate communications.
 - c. Prepare and distribute to key stakeholders an updated Site Fact Sheet that summarizes key Site information, such as history, planned IRA activities, contact point for additional information, etc. Within fifteen (15) calendar days of the effective date of the AOC, a Draft of this Site Fact Sheet shall be provided to EPA for review and approval. Within thirty (30) calendar days of the effective date of the AOC, Respondents and EPA shall conduct a conference call to discuss and reach agreement on any EPA comments on the draft.
 - d. Be prepared to hold one-on-one meetings with key stakeholders and/or members of the public, as appropriate and needed, to respond to information requests.
 - e. Supplement, as necessary, EPA's existing information repository of public documents in the Freeport Public Library on Site history, administrative/remedial/removal information, etc.

Task 8 - Interim Removal Action Report

15. The purpose of this task is to prepare a final report documenting IRA activities. The following activities shall be performed by Respondents as part of Task 8:
 - a. Prepare and submit an Interim Removal Action Report to EPA for review and approval, with a copy to TCEQ. This report shall include the following:
 - i. A narrative summary of removal activities performed, quantities of wastes removed, waste management methods and locations; decontamination procedures used for any re-usable containers, berm modifications and Site security upgrades;
 - ii. All sampling documentation and laboratory reports related to the characterization and classification of containerized wastes, decontamination fluids or accumulated rainwater at the Site;
 - iii. Manifests for all waste streams managed off-site; and
 - iv. Certificates of container destruction (if any).

III. SCHEDULE

16. Respondents shall complete the IRA field activities described herein within ninety (90) calendar days from EPA approval of the IRA Work Plan, assuming there are no major delays due to force majeure (e.g., tropical storm, hurricane or other weather-related access constraints) or permitting/regulatory requirements. It is assumed that confirmation wipe sampling results will not indicate that additional pressure washing is needed. Any follow-up pressure washing work required due to screening criteria exceedences shall not be counted against the 120-day deadline.